

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

In Re: Asbestos Products Liability
Litigation (No. VI)

This document relates to:

All cases included in the list attached
as Exhibit A (CVLO-1)

MDL No. 875

DEFENDANT CBS CORPORATION'S
SCREENING AND EVALUATION INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO CVLO-1 PLAINTIFFS IDENTIFIED ON EXHIBIT A

Pursuant to Federal Rules of Civil Procedure 33 and 34, Defendant, CBS Corporation, a Delaware corporation, f/k/a Viacom Inc., successor by merger to CBS Corporation, a Pennsylvania corporation, f/k/a Westinghouse Electric Corporation, and hereinafter referred to as ("Westinghouse"), requests that the Plaintiffs listed in each case on the attached Exhibit A provide sworn answers to the following Interrogatories and Requests for Production of Documents within thirty (30) days.

DEFINITIONS

1. "Plaintiff" means the Plaintiff or Plaintiff's Decedent.
2. "Document" means all documents and records of any kind, whether printed, written, produced by hand, or recorded or reproduced by any mechanical, digital, or electronic process. This includes any marginal comments appearing on any document.
3. When used in connection with a person, "identify" means to state that person's full name, current or last known residential and business addresses, current or last known residential and business telephone numbers, current or last known job title and place of employment, and, if known, whether the person is living or deceased.
4. When used in connection with a document, "identify" means to state with respect to each such document: the nature and substance thereof, the date it bears, the date it was

prepared, the identity or identities of the author or authors thereof, the identity of each addressee, the identity or identities of the present custodian or custodians thereof, and the present location of the document.

INSTRUCTIONS

1. If you know of any document, communication, or information but cannot give the specific information or the full information the interrogatory or request for production calls for, provide the best information you have on the subject and identify each and every person you believe to have the requested information.
2. These requests seek answers based on all information available to you, however it was obtained, and any and all information in your actual or constructive possession or knowledge, or in the actual or constructive possession or knowledge of your attorneys, agents or representatives.
3. If you claim that your answer to an interrogatory (or a part thereof) or a response to a request for the production of documents (or a part thereof) is privileged or otherwise protected from discovery, identify the information or documents by subject matter and state with particularity the nature and basis of your claim.
4. If you object to any part of an interrogatory or request for production of documents, state the basis of your objection and also respond to all parts to which you do not object.

INTERROGATORIES

1. Identify all doctors, x-ray technicians, x-ray companies, pulmonary test technicians, pulmonary testing companies, and other personnel or entities involved in screenings or medical evaluations of Plaintiff for an asbestos-related disease, and the services performed by each such person or entity.
2. Identify all documents used or generated by each of the doctors, x-ray technicians, x-ray companies, pulmonary test technicians, pulmonary testing companies, and other personnel or entities identified in response to Interrogatory No. 1 in connection with the screenings or medical evaluations of Plaintiff and all other persons represented by the Casano Vaughan Law Offices for asbestos-related disease, including but not limited to patient or client lists; billing and payment records; x-ray interpretation reports (including B read reports); medical, exposure, and occupational histories; pulmonary function test reports; reports of physical examinations; and reports of diagnoses.

REQUEST FOR PRODUCTION OF DOCUMENTS


1. Produce all documents used or generated by each of the doctors, x-ray technicians, x-ray companies, pulmonary test technicians, pulmonary testing companies, and other personnel or entities identified in response to Interrogatory No. 1 in connection with the screenings or medical evaluations of Plaintiff and all other persons represented by the

Cascino Vaughan Law Offices for asbestos-related disease, including but not limited to patient or client lists; billing and payment records; x-ray interpretation reports (including B read reports); medical, exposure, and occupational histories; pulmonary function test reports; reports of physical examinations; and reports of diagnoses.

This the 31st day of August, 2011.

Respectively submitted,

EVERT WEATHERSBY HOUFF

By: 

Richard M. Lauth

Attorney for CBS Corporation, a Delaware Corporation, f/k/a Viacom Inc., successor by merger to CBS Corporation, a Pennsylvania Corporation, f/k/a Westinghouse Electric Corporation

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CERTIFICATE OF SERVICE

I, Richard M. Lauth, do hereby certify that I have this 31st day of August, 2011, served a true copy and correct copy of the Screening and Evaluation Interrogatories and Request for Production of Documents to CVLO-1 Plaintiffs identified on Exhibit A of CBS Corporation, a Delaware corporation, f/k/a Viacom Inc., successor by merger to CBS Corporation, a Pennsylvania corporation, f/k/a Westinghouse Electric Corporation to Counsel for Plaintiffs via electronic mail and U.S. Mail and have advised all counsel for Defendants of the filing of same.

Respectively submitted,

EVERT WEATHERSBY HOUFF

By: 

Richard M. Lauth
Attorney for CBS Corporation, a Delaware Corporation, f/k/a Viacom Inc., successor by merger to CBS Corporation, a Pennsylvania Corporation, f/k/a Westinghouse Electric Corporation

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